

# superoro

## Company policy Rev. 01

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**Superoro Srl**, an Italian limited liability company operating in the design and production field of jewellery, accessories and watches, declares its commitment to managing and developing its business with constant attention and continuous improvement of its services quality respecting Human Rights, Business Ethics, health and safety in the workplace and environmental protection.

In implementing and managing its Organisational System, the company is therefore committed to adopting the principles of the Responsible Jewellery Council to responsibly self-manage itself.

The Organisational System, which applies to all of its work, is based on the following Management commitments:

- proactively listening to our customers' requirements;
- complying with the defined standards and conducting business with an eye to continuous improvement;
- ensuring the quality level of our products over time, and meeting the needs and expectations of our customers and other interested parties by ensuring maximum compliance with the requirements;
- sharing the awareness of the System importance at all levels, by releasing the operational documentation for the planning and implementation of our services;
- systematically ensuring that business and services are carried out and provided in a compatible environment and a safe workplace, in compliance with national and international regulations;
- seeking the optimisation of business processes to achieve the highest level of effectiveness and efficiency;
- complying with all applicable international, national, regional and municipal legal regulations concerning the environment and safety in the workplace, and any other requirements we may wish to adhere to voluntarily;
- pursuing continuous improvement in our environmental performances;
- ensuring the transparency and correctness of the information made available to our internal and external stakeholders;

Being aware of the social responsibility to which companies must respond in order to achieve lasting and sustainable growth, Superoro Srl applies the management requirements of the Responsible Jewellery Council, and is committed to applying and promoting ethics and respect for human rights and social practices in a transparent and responsible manner.

The application of the Responsible Jewellery Council Standard involves a number of commitments, which can be identified as indicated below:

- **Business ethics and responsible supply chain**

The company is committed to:

- carrying out our work in the utmost respect for ethical standards, ensuring integrity, transparency and compliance with current laws;
- complying with all due-diligence obligations vis-à-vis our counterparties by strictly applying the 'Know Your Customer' principles;
- not tolerating any form of corruption and/or money laundering, and ensuring that any suspicious practices are disclosed and challenged;
- making clear, in full and in detail, the characteristics of our products and services;

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- ensuring the traceability of precious metals and gems we use to make our products, to guarantee that they do not come from illicit sources or areas of armed conflict fuelled by the profits of their sale;
  - ensuring the respect of our supply chain through direct and constant monitoring of all our counterparties so that they take any action to mitigate risks arising from their procurement activities;
  - working to the best of our knowledge, and based on written assurances from our suppliers, that the diamonds and gemstones used have been sourced from legitimate sources not involved in conflict financing;
  - making all our stakeholders aware of the importance of a monitored, responsible and carefully managed supply chain.
- **Human Rights**
- The company is committed to:
- upholding the United Nations Universal Declaration of Human Rights;
  - not using child labour or any form of forced or compulsory labour;
  - guaranteeing high safety standards in the workplace in accordance with national and international regulations;
  - not discriminating in any way, or applying any form of degrading treatment, harassment, abuse, coercion or intimidation;
  - promoting the importance of transparent communication at all levels of the organisation by encouraging the possible reporting of improper behaviour of anyone working in the name and on behalf of the Company;
  - complying with current labour legislation and overseeing compliance with it;

During the period of Certification of the RJC Code of practices, no departures were noted from the Code of practices, no complaints or reports were received from counterparties, and no risky transactions were found in the supply chain according to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk areas".

All our products are made of Recycled gold.

The Company Policy is communicated to all internal and external counterparties and made available to anyone who requests it.

Monticello C.Otto, July 10, 2023

The Management

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## Report for the January - December 2022 period

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### **SUPERORO SRL,**

operating in the jewellery design and production field, consistently with the company Management intentions, declares its commitment to managing and developing its business with constant attention and continuous improvement of its services quality, respecting Human Rights, Business Ethics, health and safety in the workplace and environmental protection.

The ethical principles behind the company are summarized in the general Company Policy released and shared with all stakeholders who have relationships of any nature with the Company.

The implementation and management of its Organizational System is based on the principles of the Responsible Jewellery Council and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Cahra.

SUPERORO SRL, works to establish solid business management systems by adopting a supply chain policy that affirms our commitment to respecting man and his rights in order to avoid contributing to conflict financing by respecting all relevant resolutions and laws enacted by the United Nations and relevant global associations. We ask that our values and principles be communicated and shared by all our counterparts through the release of the Company Policy and the acceptance request of the same.

The identification of risks linked to the supply chain involves the use of a specific questionnaire sent to our suppliers according to the risk indicators referred to in the supplement to the "Due Diligence Guidance for Responsible Supply Chains of Minerals from Cahra" OECD guidelines integrated with additional requirements concerning the respect for Human Rights, regulations on Health and Safety in the workplace and compliance with environmental regulations.

All our transactions are carried out only and exclusively if the level of risk assessed for the counterparty in question is acceptable. Due to the nature of our business, risky transactions are not conceivable.

We encourage our counterparties to report any risky situations as soon as possible via email at [info@superoro.it](mailto:info@superoro.it)

It is the Management responsibility to handle and take actions about the report.

We declare that during the application period of the RJC Code of Practices, no departures were noted from the Code of Practices, no risky transactions were detected in the Supply Chain in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Cahra" and all processed transactions are low risk ones.

Monticello C.Otto, July 10, 2023

The Management